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FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 MAR 20 AM 11:44

March 16, 1989

Federal Election Commission
Washington, D.C. 20463

Re: MUR 2314

Attention: Mr. Jonathan Levin

Gentlemen:

The following is in response to your subpoena and order received with your transmittal letter dated February 3, 1989.

PREFACE: We merely acted as a technician for the Santini Committee for the input of information as provided to us into our computers producing subsequent print-outs in the campaign report format. Such reports were sent to the committee for their review, verification of accuracy, signing and filing. It was not requested that we cross-check with the reports of the NRSC and we did not. At no time were we included in the decision-making body of the committee. There was no written contract describing the services to be rendered nor was there any other agreements, correspondence, telephone memoranda or internal memoranda, pertaining to the planning for or actual conduct of the conduit operation.

1. The discrepancy appears to be in the handling of the intermediary funds from the NRSC. Certain smaller amounts (under \$200) were neglected to be reported in the itemized listing.

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These amounts were, however, included in the aggregate totals and listed under the unitemized heading.

2. a. We had no knowledge of the existence, contents or meaning of the Direct-to Program Agreement. Also, we were never informed of the NRSC masterfile, or advised of direct fundraiser costs associated with a particular mailing or event.

b. We had no knowledge of the type of NRSC solicitations made, however, we were aware that solicitations were made when we received copies of the checks from the committee.

c. We had no prior information as to the frequency or the extent of such solicitations.

d. We had no knowledge as to how solicitations were conducted with respect to each of the operations of the Direct-to Program, Direct-to Auto, The Trust Program, Majority '86 and Miscellaneous Conduiting.

e. Our knowledge of how contributions were to be passed on to the candidate from the NRSC consisted of the copies of checks furnished to us by the committee.

f. Information as to the types of cost were not disclosed to us other than a copy of each check disbursed to the NRSC with a brief description for reporting purposes.

Under penalties of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.


Chris Miller

Miller/Roos & Co.